



Maryam N. Hadden, Esq.

Partner

maryam.hadden@parlatorelawgroup.com

Direct: 646-846-6382

November 15, 2021

VIA ECF

Hon. Joan M. Azrack
United States District Court Judge
Eastern District of New York
Long Island Courthouse
100 Federal Plaza
Central Islip, NY 11722

**RE: 2 River Terrace Apartment 12J, LLC v. Howard M. Ehrenberg, 21-cv-1239-JMA
Request for Additional Time to Respond to Motion to Dismiss**

Dear Judge Azrack:

I am writing to respectfully request additional time to respond to the Motion to Dismiss the Appeal, which was filed by Appellee on October 6, 2021. The Motion was filed after the Appeal had been fully briefed. Appellant does wish to file an opposition to the Motion; unfortunately, Appellant is an entity managed by a single person who has been undergoing medical treatment with since early October; the side effects have been severe and have required prescription pain medication and steroid treatments which have rendered Appellant's manager unable to assist counsel in drafting a response. This medical treatment was scheduled to conclude on November 10, 2021 and I initially requested an extension to November 15th; counsel for Appellee did not object to that extension. Unfortunately, Appellant's manager's treatment did not conclude on the predicted date and he has remained substantially unavailable to counsel.

I spoke with counsel for the Appellee who has no objection to a further extension of two weeks for Appellant to respond. Appellant is therefore requesting November 29, 2021, as a date for the response to be filed. This request does not affect any other scheduled deadline or court appearance. This is Appellant's second request for an extension.

Respectfully submitted,

/s/ Maryam Hadden

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One World Trade Center, Suite 8500, New York, NY 10007



Maryam N. Hadden
Attorney for Appellant
Parlatore Law Group, LLP
One World Trade Center, Suite 8500
New York, New York 10007
Tel: 646.846.6382 | Fax: 212.409.8972
maryam.hadden@parlatorelawgroup.com

cc: all counsel via ECF